

4. **Interrogatories:** The parties will serve their first interrogatories by February 22, 2019.

5. **Requests to Admit:** The parties will serve their first requests to admit by April 26, 2019.

6. **Close of Fact Discovery:** Fact discovery will close by June 7, 2019.

7. **Summary Judgment Motions:** Any summary judgment motions will be due on or before June 28, 2019. Any opposition thereto will be due on July 19, 2019. Any reply thereto will be due on July 26, 2019.

B. Other Matters

1. Electronic Discovery:

The parties anticipate that discovery in this case will involve the production of hard copy documents and electronically stored information (“ESI”). The parties will meet and confer in good faith throughout the course of discovery in an effort to avoid the need for any formal motions related to discovery of ESI.

2. Issues Relating to Claims of Privilege

The parties shall produce privilege logs within a reasonable time after production. The parties will confer in good faith on the ways to minimize the burden of privilege logs. The parties agree that any inadvertent disclosure of privileged material in the course of discovery shall not constitute a waiver of privilege, provided that the party who made the inadvertent disclosure promptly notifies the other party upon becoming aware of the disclosure.

3. Changes to Limitations on Discovery

The parties do not anticipate any additional changes to or limitations on discovery at this time.

4. Protective Order

The parties recognize that this matter may require the production of sensitive commercial information and therefore agree that it is appropriate to enter into a protective order to govern the handling of such information. Before documents are produced, the parties will execute a stipulated pre-trial protective order for this Court's approval.

C. Trial

Based on the claims currently advanced by Plaintiff, the parties contemplate that trial in this matter will take 2-3 full days (including *voir dire*), but reserve the right to revise this estimate after the scope of the case becomes clearer. The parties do not consent to trial before a magistrate judge. The parties request that the case be tried before a jury.

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